

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WISCONSIN

JASON FULLER,
Plaintiff,

v.

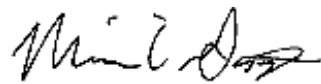
Case No. 07-C-0305 C

PATRICIA HEINTZ-CANDEE,
Defendant.

DEFENDANT'S MOTION UNDER RULE 54 FOR FEES AND COSTS

Defendant Patricia Heintz-Candee ("Defendant"), through her counsel, Boyle Fredrickson S.C., moves pursuant to Rule 54, Fed. R. Civ. P., for the Court to award Defendant the fees and costs she incurred while defending a meritless case that was dragged out for more than a year by Plaintiff and his counsel solely for the purposes of harassment. For the reasons detailed in the supporting memoranda, Defendant is entitled to recover her fees and costs from Plaintiff and/or Plaintiff's counsel pursuant to 15 U.S.C. § 1117(a), 15 U.S.C. § 1120, and/or 28 U.S.C. § 1927.

Respectfully submitted,

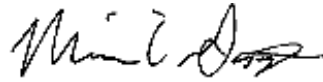


Dated: August 22, 2008

Michael J. Gratz
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PATRICIA HEINTZ-CANDEE

CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2008, I electronically filed the foregoing documents with the Clerk of the Court using the ECF system, which will send notification of the filing to Michael T. Hopkins, counsel for plaintiff.



Michael T. Griggs

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